

Evan Glassman
+1 212 506-3909 direct
eglassman@steptoe.com

Steptoe

1114 Avenue of the Americas
New York, NY 10036-7703
212 506 3900 main
www.steptoec.com

April 15, 2024

Via ECF

Hon. Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *Cargill, Incorporated v. Public Joint Stock Company National Bank Trust,*
Case No. 23-mc-00134-PGG**

Dear Judge Gardephe:

We represent Public Joint Stock Company National Bank Trust (“NBT”) in connection with the above-referenced matter. We write in follow-up to our letters of December 6, 2023 and March 4, 2024 (ECF Nos. 42, 43), in order to provide the Court with an update on the underlying foreign proceedings in the British Virgin Islands (the “BVI Proceedings”).

Service of the BVI Proceedings has been made upon, and has been acknowledged by, the defendants in the British Virgin Islands, Russia, the United States (*i.e.*, Cargill, Inc. and certain of its subsidiaries), and the United Kingdom.¹ As set forth in NBT’s prior submissions, the discovery sought by its application for discovery under 28 U.S.C. § 1782 (the “Application”)² will be used by NBT in its prosecution of the BVI Proceedings, which are now pending.

Please let us know if any additional information would be helpful to the Court’s resolution of the pending motions (ECF Nos. 1, 34) relating to the Application. We are grateful for your continued consideration and courtesies in this matter.

Best regards,

/s/ Evan Glassman
Evan Glassman

CC: Counsel of Record

¹ NBT is also in the process of serving the remaining defendants located in Singapore, Switzerland, Hong Kong, and Uruguay, and anticipates that service will be complete within the next two weeks.

² *In re Ex Parte Application, Under 28 U.S.C. § 1782, of Public Joint Stock Company National Bank Trust*, Case No. 23-mc-00006-PGG, ECF No. 1.